

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case No. 7:08-cv-03680-SCR

COASTAL SALES ASSOCIATES, INC.,  
Plaintiff/Counterdefendant

v.

KEEPJOY INDUSTRIAL COMPANY, LIMITED,

Et Al

Defendants/Counterclaimants.

**Request for An Extension of Time to Submit  
the Case Discovery Plan and Proposed Scheduling Order**

Defendants/Counterclaimants, Keepjoy Industrial Company, Ltd., (Hereafter KIC), by and through their counsel, requests this Court to allow an extension of time to file the Case Discovery Plan and Proposed Scheduling Order. KIC would like to file the same to the Court by **June 30, 2008** and set the Initial Case Management Conference on **July 28, 2008, Monday, at 10:00AM**, if permitted. The reasons for such a request are due to the fact that KIC resides abroad and more time is needed to gather evidence and other necessary information for a fair and just adjudication of the case. KIC counsel has conversed with CSA counsel and they consent to such request.

Therefore, KIC respectfully asks this Court to grant its request for an extension of time to submit the Case Discovery Plan and Proposed Scheduling Order as specified above.

Dated: June 6, 2008

For all parties,  
Time to submit proposed scheduling order  
is extended to 6/30/08. Parties should  
submit joint proposed order unless they  
cannot agree, in which case the parties  
may submit individual proposed orders.  
Initial conference is adjourned  
to 7/25/08 @ 10AM

KEVIN KERVENG TUNG, P.C.  
Attorneys At Law

By: /kevintung/

**APPLICATION GRANTED**

*Stephen C Robinson*

HON. STEPHEN C. ROBINSON

6/10/08

